

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) ZHN, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-12-1289-M
	)	
(1) RANDY MILLER, LLC;	)	
(2) RANDY L. MILLER;	)	
(3) LIPPARD AUCTIONEERS, INC.;	)	
(4) TROY LIPPARD;	)	
(5) ANGIE LIPPARD;	)	
(6) BRADY LIPPARD;	)	
(7) JERRY WHITNEY; and	)	
(8) UNITED COUNTRY REAL	)	
ESTATE, INC.; d/b/a UNITED	)	
COUNTRY AUCTION SERVICES	)	
AND UNITED COUNTRY	)	
REAL ESTATE SERVICES,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE OVERSIZED BRIEF IN  
RESPONSE IN OPPOSITION TO DEFENDANTS RANDY MILLER LLC'S AND  
RANDY MILLER'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff ZHN, LLC, moves pursuant to LCvR7.1(e) for leave to file an oversized brief having forty-five (45) pages for its Response in Opposition to Defendants Randy Miller LLC's and Randy Miller's Motion for Summary Judgment [Doc. 135]. This request for fifteen (15) additional pages is made in order that all matters raised in the subject Motion are fully addressed and plaintiff's factual position adequately represented.

The Court is advised that opposing counsel objects to this request.

### **Relief Requested**

For the reasons set forth herein, Plaintiff respectfully requests that this Court grant Plaintiff leave to file an oversized brief having forty-five (45) pages for its Response in Opposition to Defendants Randy Miller LLC's and Randy Miller's Motion for Summary Judgment [Doc. 135].

/s/ Murray E. Abowitz

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**ATTORNEYS FOR PLAINTIFF, ZHN,  
LLC**

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of December 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic filing to the following ECF registrants:

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/s/ Murray E. Abowitz  
Murray E. Abowitz